

REMARKS

The application is believed to be in condition for allowance.

If this response does not place the case in condition for allowance, a specific advisory action identifying FRANZ's disclosure of each point raised below is respectfully requested.

Claims 1-2, 4-6, and 8-16 are pending.

There are no formal matters outstanding.

Claims 1, 10, and 16 are stated as being rejected as anticipated by FRANZ et al. (EP 805403); however, it appears that all claims except for claim 13 are rejected as anticipated. If the case is not allowed, clarification is requested.

Claim 13 stands rejected as obvious over FRANZ et al. in view of BROWN et al. 5,768,603.

The present invention and FRANZ are fundamentally different in that FRANZ allocates a sentence into predetermined syntax units of sentence structures, whereas the present invention learns, all the time via interaction with the user, in order to better allocate the sentences into segments.

This aspect of the invention is recited (claim 1) by the following:

"when no model segment to be selected following the second rule is found as a result of the comparison of the structural segments,"

"i) the structural segment is displayed by means of a user interface to a user,"

"ii) after the structural segment being displayed to the user, the user inputs, from the user interface, the translation of the displayed structural segment as the equivalent segment,"

"iii) storing the structural segment and the equivalent segment, input by the user, in the knowledge base for use as model segments in the knowledge base, and"

"one of said rules is updated on the basis of equivalent segment input by the user from the user interface."

FRANZ does not disclose this aspect of the present invention and is therefore not anticipatory.

In claim 10, this is recited as:

"when no model segment to be selected following the second rule is found as a result of the comparison of the structural segments,"

"i) the structural segment is displayed by means of a user interface to a user,"

"ii) after the structural segment being displayed to the user, the user inputs, from the user interface, the translation of the displayed structural segment as the equivalent segment,"

"iii) storing the structural segment and the equivalent segment, input by the user, in the knowledge base for use as model segments in the knowledge base, and"

"one of said rules is updated on the basis of the equivalent segment input by the user from the user interface."

Any conclusion that FRANZ teaches (or suggests) these features would be derived from impermissible hindsight.

Indeed, the FRANZ disclosure found at page 7, lines 10-14 directly states that when no matching clause is found, the sentence is unchanged.

Applicants could not find "the structural segment is displayed by means of a user interface to a user", at least in a context consistent with the claims' recitations of when the second rule does not find a corresponding model segment.

Without such a display to the user, one cannot say that a user response is implicit. See FRANZ page 6, lines 26-27 and 48-50 as well as page 2, line 34. None of these passages suggest the features which the Official Action believes to be implicitly disclosed by FRANZ; indeed the passages teach the opposite.

Applicants also do not see FRANZ disclosing "storing the structural segment and the equivalent segment, input by the user, in the knowledge base for use as model segment in the knowledge base." This "storing" feature of course cannot be disclosed if the user is not presented with the structural

segment having the "not-found model segment", as the user would not have made the necessary responsive input.

Applicants believe that the present rejections are based on a misunderstanding of the scope and limitations of FRANZ. The Official Action has taken as implicit, subject matter neither taught nor suggested by FRANZ. There is no indication in FRANZ of these asserted "implicit" teaching. Rather, FRANZ only teaches a machine translation (page 2, lines 25 and 33) or a no-translation action when no appropriate model segment is found (the FRANZ disclosure found at page 7, lines 10-14 directly states that when no matching clause is found, the sentence is unchanged).

Taking the above into consideration, applicants believe that it is clear that the independent claims recite the invention in a manner which is both novel and non-obvious over the prior art. Accordingly, reconsideration and allowance of all the pending claims are respectfully requested.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 25-0120 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

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